



# Council of Social Service of New South Wales

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Taxi, private bus and private ferry reviews  
Independent Pricing and Regulatory Tribunal  
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## **NCOSS Submission to the 2003 Review of fares for taxis in NSW**

The Council of Social Service of NSW (NCOSS) is the peak body for the social and community services sector in New South Wales. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in NSW.

NCOSS provides an independent voice on welfare policy issues and social and economic reforms and is the major co-ordinator for non-government social and community services in NSW.

NCOSS welcomes the opportunity to make a submission to the review of fares for taxis in NSW. Given the pivotal role of played by taxis in providing people with mobility and social access, any prospective fare rise or new fee imposition will have significant consequences for the community, particularly for people on low incomes who are unable to take advantage of other modes of transportation.

### **Cost Index Approach to Fare Setting and Alternative Approaches.**

NCOSS expresses concern over the use of the cost index approach to fare setting, as this does not appear to take into account social considerations or service standards. *NCOSS recommends that any fare increase for private taxis should take into account service users' capacity to pay, with particular reference to low income passengers.* Utilisation of social cost of living indices as an 'outside' cost indicator<sup>1</sup> may be one mechanism by which to take into consideration the potential social impacts of proposed taxi fare increases. Increases in the quality of services delivered may also justify fare increases, particularly where operators can demonstrate improvements in the training of drivers.

### **Taxi Fare Changes and Social Impacts**

Taxi fare changes have significant impacts upon older people and people with disability who make use of taxis where other forms of transport (either public or private bus or ferry)

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<sup>1</sup> Independent Pricing and Regulatory Tribunal of New South Wales, "Review of fares for taxis, private buses and private ferries in NSW: An Issues Paper," April 2003, pp24-5.

are not available. As observed in the issues paper,<sup>2</sup> some relief for the potentially high costs associated with the use of taxis is available through the Taxi Transport Subsidy Scheme. Yet despite the generous (50%) subsidy offered through this scheme, transport costs incurred can still be very high, particularly where frequent travel (for example to place of employment, or to medical appointments) is required.

NCOSS also emphasises that there are many people who are not eligible for the Taxi Transport Subsidy Scheme, but due to the lack of availability of appropriate and accessible transport, may be compelled to make use of taxis as the only viable form of transport to important destinations. Currently the Scheme is available to people who can provide medical evidence of ambulatory problems, vision impairment, or epilepsy. The Scheme is also available to some people with intellectual disability or a communication difficulty. But eligibility to the Scheme is only granted where a *permanent* disability is demonstrated. Thus, those who experience impairment upon a temporary basis may face high costs utilising taxi transport for important appointments. For example, older people who require post acute care can incur high costs as a result of the utilisation taxis to attend medical appointments and rehabilitation. Similarly, some people with episodic illnesses may need to make intensive use of taxi transport for short periods of time, and consequently face high transport costs. The costs associated with taxi use can become prohibitive for people on low incomes, such as pensioners and people who are unemployed, particularly where frequent transport is involved.

### **Fare Structure for Wheelchair Accessible Taxis (WATs)**

Currently WAT drivers who pick up passengers using wheelchairs are eligible to charge up to 15 minutes of waiting time to cover time spent loading and unloading.

Whilst it is fair for drivers to be 'compensated' for some of the time associated with loading and unloading passengers from WATs, there a number of factors which can unfairly impact on costs for passengers. For example the training and experience of the driver can effect the waiting time involved. Similarly, the accessibility of the vehicle itself ( eg the ease of loading, design) can also impact upon waiting times and hence raise costs for passengers.

NCOSS further notes that any additional costs associated with operating a Wheelchair Accessible Taxi should be more than adequately covered by the generous subsidies that are available for operators of such vehicles.<sup>3</sup>

*NCOSS advocates the maintenance of the current system, with an emphasis on increasing the awareness and skills of drivers of WATs to minimise waiting times and hence limit charges to passengers.* If a lift fee is to be made payable to drivers of WATs, then the fee should replace the waiting time allowance, and be subsidised fully by the Department of Transport, to limit the imposition of additional costs upon wheelchair users. Further, any lift fee received by drivers must be tied to the delivery of performance outcomes (as it is in the South Australian model) to ensure that any incentive to collect wheelchair users also improves the quality of services received.

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<sup>2</sup> Ibid., p52.

<sup>3</sup> See Physical Disability Council of NSW submission to HREOC Draft Report, 2001, " Still Waiting For Godot": Taxis And Discrimination Against People Who Use Wheelchairs; *A Response To The HREOC Draft Report On Wheelchair Accessible Taxis*" pp9-13.

For further information please contact Dinesh Wadiwel, Senior Policy Officer, NCOSS, on 9211 2599 ext 108 or email [dinesh@ncoss.org.au](mailto:dinesh@ncoss.org.au).

Yours Sincerely

A handwritten signature in black ink that reads "Gary Moore". The signature is written in a cursive style with a large, stylized initial "G" and "M".

Gary Moore  
Director